

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) JOSHUA FIELDS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 5:21-cv-00986-G
)	
(1) GREAT LAKES INSURANCE SE,)	
formerly known as GREAT)	
LAKES REINSURANCE UK SE,)	
)	
Defendant.)	

DEFENDANT’S PROPOSED VOIR DIRE

Pursuant to the Court’s Scheduling Order (Dkt. 26) and Rule 51 of the Federal Rules of Civil Procedure, the Defendant, Great Lakes Insurance SE (“Great Lakes” or “Defendant”) submits the following Proposed Voir Dire questions for the court’s consideration.

Defendant proposes the following questions to be posited to the jury pool in addition to the court’s general voir dire questions and instructions it intends to use:

1. Have you ever filed an insurance claim?
2. Have you ever had an insurance claim denied? Follow up on those that raise their hand to learn whether the experience would bias them toward or against the Plaintiff or Defendant.
3. Do any of you have or have ever had insurance with Great Lakes Insurance SE (“Great Lakes”)? Follow up on those that raise their hand to learn whether the experience would bias them toward or against the Plaintiff or Defendant.

4. Great Lakes is a foreign insurance company that legally sells insurance in Oklahoma. Are any of you predisposed against Great Lakes for that reason?

5. Have you ever had a property damage claim for a business? Follow up on those that raise their hand to learn whether the experience would bias them toward or against the Plaintiff or Defendant.

6. Have you ever had property, real or personal, damaged in a fire? Follow up on those that raise their hand to learn whether the experience would bias them toward or against the Plaintiff or Defendant.

7. Have you ever owned a multi-family building or apartment complex? Follow up on those that raise their hand to learn whether the experience would bias them toward or against the Plaintiff or Defendant.

8. Do any of you know Joshua Fields, the Plaintiff in this matter? Follow up on those that raise their hand to learn whether the experience would bias them toward or against the Plaintiff or Defendant.

9. Have any of you ever served on a jury? If so, were you the foreperson?

10. Do any of you have a predisposition against insurance companies?

11. Do any of you have a predisposition in favor of an insured that makes an insurance claim?

12. Do any of you believe that the language in an insurance policy should be disregarded? If so, please explain why.

13. Have any of you had to maintain fire protection devices, such as smoke alarms and fire extinguishers in your home or business as a requirement under your

property insurance policy for a fire claim to be paid? Follow up on those that raise their hand to learn whether the experience would bias them toward or against the Plaintiff or Defendant.

14. Will each of you follow the law given to you by the judge?

15. Will each of you agree to not make up your mind on this case until you have heard or seen all of the evidence?

**DOERNER, SAUNDERS, DANIEL
& ANDERSON, L.L.P.**

/s/ Emily Allan

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CERTIFICATE OF SERVICE

This certifies that on November 7, 2022, a true and correct copy of the foregoing document was served via the Court's electronic notification system to the following counsel of record:

Scott R. Jackson

/s/ Emily Allan